

# **EXHIBIT 3**

NO. 2022-41445

SARAH COPLAND, individually and on	§	IN THE DISTRICT COURT OF
behalf of the ESTATE OF ISAAC SIDNEY	§	
OEHLERS; MARY DEVILLE	§	
COCHRANE, individually and on behalf of	§	
the ESTATE OF YVONNE SURSOCK	§	
COCHRANE; TANIA DAOU, individually	§	
and on behalf of the ESTATE OF JEAN	§	
FREDERIC ALAM; CEDRIC ELLIS	§	
ALAM, YANN VICTOR ALAM, FOUAD	§	
DEBS, GEORGE CORTAS, GEORGES	§	
JUVELEKIAN, and ASYA EL-MEEDY,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
TGS ASA and TGS-NOPEC	§	
GEOPHYSICAL COMPANY,	§	
	§	
<i>Defendants.</i>	§	11TH JUDICIAL DISTRICT
	§	

**TGS-NOPEC GEOPHYSICAL COMPANY'S  
ORIGINAL ANSWER TO PLAINTIFFS' ORIGINAL PETITION**

COMES NOW Defendant TGS-NOPEC Geophysical Company ("TGS-NOPEC"), incorrectly named and served as "TGS-NOPEC Geophysical Co.", and files this Original Answer to Plaintiffs' Original Petition, and would respectfully show the Court as follows:

**GENERAL DENIAL**

1. TGS-NOPEC asserts a general denial pursuant to Rule 92 of the Texas Rules of Civil Procedure, to each and every, all and singular, allegation and claim contained in the Petition, and demands that Plaintiffs be required to prove strictly all allegations and claims set forth in the Petition, as required by the Constitution and laws of the State of Texas. Defendant further requests that the Court require Plaintiffs to prove the charges and allegations by a preponderance of the credible evidence as required by the Constitution and the laws of the state of Texas.

2. TGS-NOPEC reserves the right to amend its Answer as is the right and privilege of TGS-NOPEC under the Texas Rules of Civil Procedure and the laws of the State of Texas.

**PRAYER**

Defendant TGS-NOPEC Geophysical Company respectfully requests Plaintiffs take nothing by their suit; that TGS-NOPEC be discharged with costs; and that the Court grant TGS-NOPEC such other and further relief, both at law and in equity, both general and specific, to which it may be justly entitled, including, but not limited to, attorneys' fees.

Dated: August 5, 2022

NORTON ROSE FULBRIGHT US LLP

/s/ Kevin W. Yankowsky

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***Attorneys for Defendant TGS-NOPEC  
Geophysical Company***

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served in compliance with the Texas Rules of Civil Procedure on August 5, 2022.

/s/ Kevin W. Yankowsky

Kevin W. Yankowsky

**Automated Certificate of eService**

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Liane Hunt on behalf of Kevin Yankowsky

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Status as of 8/5/2022 3:30 PM CST

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